## FLYNN & ASSOCIATES, LLC

August 11, 2020

Dutt v. ABK Petroleum Corp, et al Docket: 1:18-cv-14117 COURTESY COPY

Via CM/ECF and USPS Priority mail

The Hon. Renee Marie Bumb, U.S.D.J.
United States District Court
District of New Jersey
4th & Cooper Streets
Camden, NJ 08101

Dear Judge Bumb,

Undersigned counsel represents the Defendants in the above captioned matter. Pursuant to the Court's Judicial Preferences and for the Court's convenience, enclosed is a hard copy of Defendants' Cross Motion for Sanctions and Opposition to Plaintiff's Motion for Sanctions, filed earlier today via CM/ECF. We are respectfully requesting oral argument in this matter. I would appreciate the Court's courtesy in scheduling this matter for the October 5, 2020 return date or later since our firm will be closed for prepaid vacation from August 28, 2020 through September 13, 2020. The potential September 8, 2020 and September 21, 2020 return dates would not allow us sufficient time to review any response filed by Plaintiff's counsels, confer with our clients and respond appropriately within the deadlines.

I thank the Court for its professional courtesies in this and all other matters.

Respectfully Submitted,

Flynn & Associates, LLC

by

Alex Flynn, Esquire

**Enclosure** 

cc: Mssrs. Knox and Kadochnikov, via email

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